IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

CATHOLIC LEGAL IMMIGRATION NETWORK, INC., et al.,)
Plaintiffs,)
v.) Civil Action No. 8:20-cv-02042-TDC
UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,))
Defendants.)))

JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

- 1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS ("Request 1"), State ("Request 2"), and DHS ("Request 3") respectively. (Compl. ¶¶ 27-40.)
- 2. On February 5, 2021, USCIS produced its fourth rolling release of documents comprised of 53 pages and 380 partially produced pages from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS is presently processing the fifth production of USCIS pages. Subject to FOIA exemptions, the fifth production of USCIS

pages is expected to be produced on or about March 8, 2021. Per the request of Plaintiffs, the fifth production will consist of responsive, non-FOIA exempt documents from OP&S.

- 3. On January 19, 2021, State produced its second rolling release of documents comprised of 4 records released in full and 18 records released in part. State is continuing to collect unclassified potentially responsive documents. The third production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before February 17, 2021. While searches for records on classified systems continue to be inhibited by the ongoing impact of COVID-19 mitigation measures on staffing, State will initiate searches of classified systems promptly upon the relevant employees re-obtaining access to those systems.
- 4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: February 16, 2021 Respectfully submitted,

___/s/____

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